

Henry Communications
1414 Hill Avenue
Napa, California 94559
(707) 226-5544
bhenry@saber.net

July 22, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex-Parte Comments in MM Docket 93-177 pertaining to AM Directional
Pertaining to Antenna Performance Verification Coalition Presentation dated
May 4, 2007

Dear Ms. Dortch:

I would like to thank The Commission for opening up the discussion for adding method of moments modeling as a way to certify the performance of an AM directional antenna system.

Until there is more correlating data available, I feel that magnetic field strength measurements should continue to be required as part of the certification process of an AM broadcast directional antenna system.

If a licensee chooses to build an antenna sampling system to the proposed tighter constraints, I would like to suggest that the FCC eliminate the requirement for close-in field measurements on a full Antenna Proof of Performance and allow, at the applicant's discretion, the use of non-directional measurement data or the theoretical inverse field to determine the non-directional reference field. I would also like to suggest that the total number of points required for certification of a new directional antenna system be reduced to that required for a Partial Antenna Proof of Performance, and that Monitor Points on critical radials be retained.

If the method of moments modeling works as described, and if the requirement for close-in non-directional field measurements is deleted and the number of required far-out field measurement points is reduced by nearly one half, full antenna performance verification measurements in the field can be made very quickly and relatively easily with minimal additional cost. The required comparative non-directional and directional field measurement

work could be completed in one week or less with all but the most complex directional arrays. Also, with this sort of comparative data available it might be possible to eliminate proposed two year antenna sampling system verification requirement the procedure of which has yet to be established.

Method of moments modeling is a powerful and effective means for tuning up an AM directional antenna system. However, having a verification procedure in place until this new methodology is fully proven with more extensive field measurement data will insure that new facilities don't cause interference with existing licensed operations.

Sincerely,

Brian J. Henry
Henry Communications
1414 Hill Avenue
Napa, California 94559
(707) 226-5544